

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re: § Case No. 08-35653-KRH
CIRCUIT CITY STORES, INC., *et al.*, § (Jointly Administered)
Debtors. § CHAPTER 11
§

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Bankruptcy Rule 2090-1 (E)(2), Robert S. Westermann (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, files this motion with the Court for an Order permitting admission of Andrew M. Brumby, Esquire, of the law firm of SHUTTS & BOWEN, LLP, 300 South Orange Avenue, Suite 1000, Orlando, Florida, 32801, to appear and practice *pro hac vice* on behalf of Cameron Group Associates, LLP (“Cameron Group”) in the above-captioned matter. In support thereof, the Movant states the following:

1. Andrew M. Brumby (Florida Bar No. 0650080) is an attorney licensed to practice law in the Florida and has been a member in good standing of the Florida Bar since 1987.
2. Mr. Brumby is also admitted to practice before the United States District Courts for the Middle, Northern and Southern Districts of Florida, and the Northern District of Georgia, as well as being admitted to the Bar of the United States Court of Appeals for the Eleventh Circuit and the United States Supreme Court.

Robert S. Westermann (VSB No. 43294)
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3. Mr. Brumby has been retained as a member of the above-named firm by Cameron Group to provide legal representation in connection with the above-styled matter now pending before the United States Bankruptcy Court for the Eastern District of Virginia (Richmond Division).

4. Mr. Brumby has never been disbarred and is not currently suspended from the practice of law in the State of Florida or any other state, nor from any United States Bankruptcy Court, District Court or Court of Appeals.

5. In addition, he has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline.

6. Mr. Brumby has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice.

7. He has not been charged, arrested, or convicted of a criminal offense or offenses.

8. Mr. Brumby is familiar with and shall be governed by the local rules of this Court, the rules of professional conduct and all other requirements governing the professional behavior of members of The Virginia Bar.

WHEREFORE, the Movant respectfully requests the entry of an order authorizing Andrew M. Brumby to appear *pro hac vice* in this case only, and for such other and further relief as the Court deems just and proper.

DATE: March 9, 2009

CAMERON GROUP ASSOCIATES, LLP

By: /s/ Robert S. Westermann
Counsel

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Counsel for Cameron Group Associates, LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have filed a copy of the foregoing Motion with this Court's CM/ECF System to be served in accordance therewith and that a copy of the foregoing document was served this 9th day of March, 2009, by either court enabled electronic filing or by depositing a copy of same in the United States Mail, postage pre-paid thereon, to be delivered to the following parties at the addresses set forth below:

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